

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LORD ABBETT AFFILIATED FUND, INC.,  
*et al.*, Individually and On Behalf of All Others  
Similarly Situated,

Plaintiffs,

v.

NAVIENT CORPORATION, *et al.*,

Defendants.

Case No. 1:16-cv-112-MN

**LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL  
OF SETTLEMENT AND PLAN OF ALLOCATION**

Pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Providing for Notice dated November 22, 2021 (D.I. 341), and upon (i) the Declaration of Jeremy P. Robinson in Support of (A) Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation and (B) Lead Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses; (ii) the Brief in Support of Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation; and (iii) all other papers and proceedings herein, Lead Plaintiffs Lord Abbett Affiliated Fund, Inc., Lord Abbett Equity Trust—Lord Abbett Calibrated Mid Cap Value Fund, Lord Abbett Bond-Debenture Fund, Inc., and Lord Abbett Investment Trust—Lord Abbett High Yield Fund (collectively, "Lead Plaintiffs" and the "Lord Abbett Funds") will and hereby do move this Court, before the Honorable Maryellen Noreika, on March 17, 2022, at 2:00 p.m. at the United States District Court for the District of Delaware, J. Caleb Boggs Federal Building, 844 N. King St., Wilmington, DE, Courtroom 4A, or at such other location and time as set by the Court, for entry of a Judgment approving the Settlement as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of Allocation as

fair and reasonable. A proposed Judgment and Order granting the requested relief will be submitted with Lead Plaintiffs' reply papers after the deadlines for objecting to the Settlements and requesting exclusion from the Settlement Class have passed.

Dated: February 10, 2022

Respectfully submitted,

/s/ Christopher M. Foulds

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